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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROSA BAGHDASARIAN, an individual,
Plaintiff,

vs.

LOWE'S HOME CENTER, LLC. dba
LOWE'S HOME CENTER, LLC-STORE #
0784, a Foreign Limited-Liability Company,
DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO: 2:18-cv-01809-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND JOINT PRE-TRIAL ORDER**

(SEVENTH REQUEST)

The parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Joint Pre-Trial Order deadline of June 15, 2020 in the above-captioned matter for ten (10) days from the previous deadline, to June 25, 2020. In support of this stipulation, the parties state as follows:

I. DISCOVERY COMPLETED

1. The parties have served initial disclosures pursuant to Fed. R. Civ. P. 26(a).
2. The parties have each served two supplements to their initial Rule 26(a) disclosures.
3. Defendant has propounded interrogatories and requests for production of documents, and Plaintiff has served responses thereto.
4. Plaintiff has propounded two sets of interrogatories, two sets of request for production of documents, and one set of requests for admission, and Defendant has served responses thereto.
5. Defendant has taken the deposition of non-party Robert Charles.

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6. Defendant has taken the deposition of Plaintiff.

7. The parties have served initial expert disclosures.

8. Defendant has taken the deposition of non-party witness Kamran Zahedi.

9. Plaintiff has taken the deposition of Lowe's employee Laurene Stevens.

II. LIMITED, ADDITIONAL TIME SOUGHT FOR COMPLETION OF JOINT PRETRIAL ORDER

Despite counsel's mutual, good-faith efforts, the parties have not been available to conduct a meet and confer to discuss exhibits for the Joint Pretrial Order due to the parties' limited availability and scheduling conflicts. Plaintiff's counsel, apologetically, bears primary responsibility for these scheduling issues. Although engaging in a meaningful meet-and-confer regarding trial exhibits is fairly challenging at the moment given the ongoing pandemic, both sides are nevertheless confident that party counsel will be able to complete the Joint Pretrial Order within the next 10 days, and are actively working together to ensure the same.

III. GOOD CAUSE/EXCUSABLE NEGLIGENCE SUPPORTING REQUESTED RELIEF

Discovery is complete in this matter, and the parties are not seeking to reopen this phase of the case. Rather, the parties simply need to meet-and-confer in a safe, productive and mutually-available setting before submitting the Joint Pretrial Order. The parties recognize and acknowledge the importance of the Court's deadlines, and similarly understand the importance of adhering thereto. The parties respectfully submit that, under the current circumstances, there exists good cause justifying the relief sought herein, and appreciate the Court's consideration for this requested 10-day extension.

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IV. PROPOSED, REVISED SCHEDULE

The parties' proposed, revised schedule for completing the Joint Pretrial Order is as follows:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	March 16, 2020	To remain closed
Amendment to Pleadings	Closed	To remain closed
Interim Status Report	Completed	N/A
Expert Disclosure	Closed	To remain closed
Rebuttal Expert Disclosure	Closed	To remain closed
Dispositive Motions	May 14, 2020	To remain closed
Joint Pretrial Order	June 15, 2020	June 25, 2020

WHEREFORE, for the reasons set forth herein, the parties respectfully request that the Court extend the deadline for filing the Joint Pretrial Order by 10 days, in accordance with the table set forth above.

**OLSON CANNON GORMLEY
& STOBERSKI**

/s/ Walter Cannon

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/s/ Ramzy P. Ladah

Ramzy Paul Ladah
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Attorney for Plaintiffs

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ORDER

Based upon the foregoing stipulation of the parties, and good cause appearing therefor, it is hereby ORDERED that the deadline to file the Joint Pretrial Order shall be extended in this matter, as follows:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	March 16, 2020	To remain closed
Amendment to Pleadings	Closed	To remain closed
Interim Status Report	Completed	N/A
Expert Disclosure	Closed	To remain closed
Rebuttal Expert Disclosure	Closed	To remain closed
Dispositive Motions	May 14, 2020	To remain closed
Joint Pretrial Order	June 15, 2020	June 25, 2020

IT IS SO ORDERED.

DATED this 16th day of June, 2020.



U.S. MAGISTRATE JUDGE

